

"Please File In Case"
 IN THE UNITED STATES DISTRICT COURT
 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE,
 Plaintiff,
 vs.

KENNETH D. KYLER, et al.,
 Defendants.

CIVIL No. 1-00-00-00
 U.S. District Judge Ram
 State Judge Smyke
FILED
HARRISBURG

DEC 21 2000

MARY E. D'ANDREA, CLERK
 Per mt
 DEPUTY CLERK

MOTION FOR ENLARGEMENT OF TIME

COMES NOW the Plaintiff & Counsel in the above entitled
 Action, John Richard JAE, as a layman, unlettered in the Arts & Science
 of the Law & Legal Procedures within the United States, and
 his Motion For Enlargement of Time, pursuant to Fed. R. Cr.
 & averts, deposes & states:

1. On or About October 17, 2000, Defendants, by Counsel
 filed their Motion For Summary Judgment and stated
 of undisputed facts, herein this case.

2. On or About December 5, 2000, Defendants, by Counsel
 filed their Defendants' Memorandum In Support of Motion
 Summary Judgment and ~~Documents~~ supporting Defendant
 Motion For Summary Judgment, herein this case.

3. Due to the facts that Plaintiff has filed
 Motion For Remand of Case Back To State Court And
 In Support and Amended Motion For Remand of Case Back
 State Court And Amended Brief In Support, herein this case
 this court has not yet ruled upon, and that this has other
 obligations which must be dealt with first, and due
 staff limit the number of times and hours which this
 cannot use the Summary Law Library here for legal research.

materials contained therein are extremely limited and also due to the facts that Plaintiff is totally financially indigent and has no money at all to pay for photocopies of his Brief in opposition to Defendants' Motion for Summary Judgment and Brief in Support, nor for the photocopies of the Documents which he intends to submit in support of his Brief nor of the other papers he'll file with his Brief & the Pa. Dept. of Corrections does "not" provide free photocopies of documents/papers & the one person which copies for Plaintiff has requested that Plaintiff send him nothing else to copy until February 2001, Plaintiff is unable to file & serve his Brief in opposition to Defendants' Motion for Summary Judgment and Brief in Support and his supporting Documents/papers on or before the present due date of December 22, 2000, and thus he requests an enlargement of time of sixty (60) days from this date to & including February 18, 2001, in which to file & serve his Brief in opposition to Defendants' Motion for Summary Judgment and Brief in Support and supporting Documents/papers, herein this case:

RESPECTFULLY SUBMITTED

(s) John Richard J. J.
MR. JOHN RICHARD J. J.

Dated = 18th DECEMBER 2000 =

#BA-3219

SCI-Greene/SMU

175 Progress Drive

CERTIFICATE OF SERVICE Waynesburg, PA-15370

Plaintiff and his counsel

I certify that on 12-18-00, I mailed to the Person listed below true & correct carbon copy of this Motion for Enlargement of Time by 1st Class Mail, postage pre-paid & addressed to =

MR. Michael C. Harvey, SDAG
Office of the Atty. Gen. of Pa.
18th Floor, Strawbery Square
Harrisburg, PA-17100

(s) John Richard J.
MR. JOHN RICHARD J.
Plaintiff and his counsel

Dated/Executed on = 18th DECEMBER 2000 =

At = Waynesburg, PA, Pennsylvania =